

1 Michael V. Infuso, Esq., Nevada Bar No. 7388
2 Keith W. Barlow, Esq., Nevada Bar No. 12689
3 **GREENE INFUSO, LLP**
4 3030 South Jones Boulevard, Suite 101
5 Las Vegas, Nevada 89146
6 Telephone: (702) 570-6000
7 Facsimile: (702) 463-8401
8 E-mail: minfuso@greeninfusolaw.com
9 kbarlow@greeninfusolaw.com

10 Attorneys for Defendant
11 National Consumer Telecom & Utilities Exchange, Inc.

12 **UNITED STATES DISTRICT COURT**
13 **DISTRICT OF NEVADA**

14 KELSEY O'HANLON,

15 Plaintiff,

16 v.

17 NATIONAL CONSUMER TELECOM &
18 UTILITIES EXCHANGE, INC., and AT&T
19 SERVICES, INC.

20 Defendants.

21 Case No. 2:22-cv-01347-JCM-EJY

22 **STIPULATION FOR EXTENSION
23 OF TIME FOR NATIONAL
24 CONSUMER TELECOM &
25 UTILITIES EXCHANGE, INC. TO
26 FILE RESPONSE TO COMPLAINT**

27 **(THIRD REQUEST)**

28 Defendant National Consumer Telecom & Utilities Exchange, Inc. ("Defendant" or
17 "NCTUE"), by and through its counsel of record, the law firm Greene Infuso, LLP, and Plaintiff
18 Kelsey O'Hanlon ("Plaintiff"), by and through her counsel of record, the law firm of Kind Law
19 and Freedom Law Firm hereby stipulates and agrees as follows:

20 WHEREAS, Plaintiff filed its Complaint on August 18, 2022;

21 WHEREAS, Defendant NCTUE'S deadline to respond to Plaintiff's Complaint is October
22 27, 2022;

23 WHEREAS, NCTUE's counsel is still conducting an investigation into allegations of
24 Plaintiff's Complaint and has encountered difficulties locating the documents needed in order to
25 prepare a response to the Complaint;

26 WHEREAS, Plaintiff has agreed to give Defendant NCTUE up through and including
27 November 10, 2022 in which to respond to Plaintiff's Complaint;

1
2 WHEREAS, there are no other deadlines that are affected by this stipulation that are
3 presently known to the parties; and

4 WHEREAS, this stipulation is not entered into for any improper purpose or to delay;

5 THEREFORE, Plaintiff and NCTUE hereby stipulate and agree that NCTUE may have up
6 through November 10, 2022 in which to respond to Plaintiff's Complaint.

7
8 Respectfully Submitted by:

9 **GREENE INFUSO, LLP**

10
11 /s/ Michael V. Infuso
12 Michael V. Infuso, Esq.
Nevada Bar No. 7388
13 Keith W. Barlow, Esq.
Nevada Bar No. 12689
3030 South Jones Blvd. Suite 101
14 Las Vegas, Nevada 89146

Approved by:

KIND LAW

15
16 /s/ Michael Kind
17 Michael Kind, Esq.
Nevada Bar No. 13903
18 8860 S. Maryland Pkwy, Suite 106
Las Vegas, Nevada 89123

19
20 **FREEDOM LAW FIRM**

21
22 /s/ Gerardo Avalos
23 George Haines, Esq.
Nevada Bar No. 9411
24 Gerardo Avalos, esq.
Nevada Bar No. 15171
8985 S. Eastern Ave., Suite 350
25 Las Vegas, Nevada 89123

26
27 **ORDER**

28
29 **IT IS SO ORDERED.**

30
31 Dated this 28th day of October 2022.

32
33
34 
35 CLAYTON J. ZOUCHAL
36 UNITED STATES MAGISTRATE JUDGE